

REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments and arguments set forth fully below. Claims 1, 2, 4, 6, 12, 14, 16, 19-21 and 25-33 were previously pending in the instant application. Within the Office Action, Claims 27 and 31-33 have been withdrawn and Claims 1, 4, 6, 12, 14, 16, 19-21, 25, 26 and 28-30 have been rejected. By way of the above amendments, Claims 1, 4, 6, 12, 20 and 25-31 have been amended and Claim 21 has been canceled. Accordingly, Claims 1, 2, 4, 6, 12, 14, 16, 19-20 and 25-33 are still pending in this application.

Withdrawal of Claims:

Within the Office Action Claims 27 and 31-33 have been withdrawn. It is stated within the Office Action that Claim 27 has been withdrawn for failure to find support in the elected species represented by Figs. 1B and 5A. While Applicants initially agreed to cancel Claim 27, upon further review, Applicants believe that the interpretation of Claim 27 was in error. Please note that in the Fig. 1B, both the “first region 131” and “second region 135” have a squeegee element 137 and 133, respectively. Accordingly, there is clear support for the first support surface comprising a second squeegee element protruding therefrom. The term “second squeegee” refers to the first squeegee protruding from the first support surface and the second squeegee protruding from the cleaning head; the “first squeegee” claimed protrudes from the second support surface. In the event that there is still confusion regarding support for the limitation of a second squeegee, please cancel Claim 27 by way of an Examiner’s Amendment.

Regarding Claims 31-33, it is stated within the Office Action that these claims have been withdrawn for reciting “substantially circular” instead of “circular.” During a teleconference, the Examiner has agreed that there is support for the term “substantially circular” and has agreed to rejoin Claims 31-33 into the prosecution of this Application.

Objection to Claims:

Within the Office Action Claims 4, 12, 20 and 26 have been objected to for a number of informalities. By way of the above amendment Claims 4, 12, 20 and 26 have been amended to correct these informalities.

Rejections Under 35 U.S.C. § 102(e)

Within the Office Action Claim 25 been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2004/0154112 to Braun (hereafter, "Braun").

Within the Office Action it is stated that it is unclear if this Application is given priority from Provisional Application No. 60/439,317 because the Provisional Application No. 60/439,317 does not teach counter rotating sections where the first wiping region surrounds the second wiping region.

While the Applicant still contends that Braun does not qualify as prior art, the Applicant has amended Claim 25 to delete terms directed to separate motion and Claim 25 now recites a second support surface with a second wiping region, wherein the first wiping region surrounds the second wiping region, and the first support surface and the second support surface are configured to move automatically wherein at least one of the first wiping region and the second wiping region comprises a squeegee element with elongated walls that protrude to form a top wiping edge, and at least one of the first wiping region and the second wiping region comprises bristles. Claim 25 is clearly supported in **Fig. 5M** as well as the Specification and other Figs. in the Provisional Application No. 60/439,317. Accordingly, Applicants respectfully request the rejection of Claim 25 under 35 U.S.C. § 102(e) as being anticipated by Braun be withdrawn.

Rejections Under 35 U.S.C. § 103(a)

Within the Office Action, Claims 1, 2, 4, 6, 12, 14, 16, 19 and 26 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,032,313 to Tsang (hereafter, "Tsang") in view U.S. Patent No. 5, 289,605 to Armbruster (hereafter, "Armbruster")

Tsang teaches multiple cleaning regions with bristles, some that surround others and move independently in different directions. Tsang also teaches that the bristle can be replaced by polishing pads. According to Tsang, "FIG. 7 shows an application in which the bristles of the various brush designs are replaced by polishing or buffing discs to obtain a hand-held polisher of the type used to polish automobiles." [Tsang, column 10, lines 47-50] However, Tsang, clearly fails to teach the combination of sponge or polishing pads and bristles.

Armbruster teaches a single embodiment of sponge or polishing pads in combination with bristles. Armbruster states that "the disc with sponges thereon may typically be 6" in diameter with the disc being plastic injection molded with interchangeable discs including brush bristles or a combination of sponge and brush bristles." [Armbruster, column 8, lines 13-17] Accordingly, the Applicants agree that Armbruster clearly teaches the combination of sponge or polishing pads

and bristles. However, Applicants contend that Tsang and Armbruster cannot be construed as rendering obvious all squeegee/bristle configurations and that such an interpretation of Tsang and Armbruster would be an overly broad interpretation of the prior art.

Applicants have previously argued that the sponges and polishing pads of Tsang and Armbruster can not be construed as squeegees. Applicants maintain that squeegees are structurally different from sponge and polishing pads. It is difficult to understand how the sponge and polishing pads taught by Tsang or Armbruster have elongated walls that form a elongated wiping edges. Further, it is unclear how the sponge or polishing pads taught by Tsang or Armbruster can be construed as having opposed curved elongated walls that protrude to form a corresponding curved elongated wiping edge. Nevertheless, Applicant will acquiesce to the notion that sponges and polishing pads can theoretically provide a “squeegee function” and, therefore, can be construed as squeegees in the broadest sense of the word. And while rejecting the claims in this application based on the functional similarities between sponge/polishing pads and squeegees ignores the structural differences described above, the Applicants will now direct arguments toward other distinguishing features of the claimed invention. Specifically, Applicants direct the present arguments towards the particular arrangements or configurations of squeegees and bristles that are being claimed.

As stated above, Tsang fails to teach or suggest the combination of sponge or polishing pads and bristles. Further, a careful examination of Armbruster shows that Armbruster teaches only a single embodiment of sponge or polishing pads in combination with bristles. Specifically Armbruster states that “FIG. 10 illustrates an option of having brush bristles 84A in the open center 84.” [Armbruster, column 4, lines 48-49] This single embodiment includes sponge or polishing pads with a single grouping of bristles. The single grouping of bristles are positioned in the center of the polishing disc and are surrounded by the sponge or polishing pads.

Armbruster further states with regards to bristle polishing devices that “while such devices function adequately when cleaning floor surfaces or similar horizontal surfaces, they are usually equipped with stiff bristles and that are quite heavy and not suitable for cleaning plastic surfaces with gel coat since the brush bristles will scratch the surface.” [Armbruster, col. 1, lines 35-40] Accordingly, Armbruster teaches that sponge or polishing pads are better than bristles.

In contrast to the teachings of Tsang, Armbruster and their combination the present invention has squeegee elements with walls or wiping edges that are flanked on opposed sides by bristles and/or are surrounded by bristles. These squeegee/bristle configurations are not suggested or taught by Tsang, Armbruster and their combination. Also, these squeegee/bristle

configurations are counter to the teachings of Armbruster. There are a number of other features that are recited in each of the independent claims described below which collectively along with the squeegee/bristle configurations claimed render them unobvious over the teachings of Tsang, Armbruster and their combination.

5 Specifically, claim 1 is directed to a device with a plurality of support surfaces that move independently and in a plurality of directions, wherein the device has a squeegee and **bristles that flank opposed sides of an elongated wiping edge of the squeegee**. The combination of independently movable sections, with a squeegee and bristles that flank opposed sides of curved elongated wiping edge of the squeegee, is neither taught nor suggested by Tsang, Armbruster or
10 their combination

 The independent Claim 12 is directed to a device with a portion of the bristles protruding from a first support surface and the second support surface that flank opposed sides of curved elongated walls of a squeegee. Again, the combination of independently movable sections, with a squeegee and bristles that flank opposed sides of curved elongated walls of the squeegee, is
15 neither taught nor suggested by Tsang, Armbruster or their combination.

 The independent Claim 26 recites a cleaning head comprising a first support surface with a first squeegee element with a curved elongated wiping edge and curved elongated walls and bristles protruding therefrom, a second support surface that is separate from the first support surface, the second support surface having a first squeegee element with a curved elongated
20 wiping edge and curved elongated walls and bristles protruding therefrom, wherein a portion of the bristles protruding from the first support surface and the second support surface border the curved wiping edge and means to couple the cleaning head to a motorized handle that automatically moves the first support surface relative to the second support surface. For all the reasons stated above, these features are neither taught nor suggested by Tsang, Armbruster or
25 their combination.

 Claims 2, 4 and 6 depend from the independent Claim 1 and Claims 14, 16, and 19 depend from the independent Claim 12. For all the reasons stated above, the independent Claims 1 and 12 are allowable over the teaching of Tsang, Armbruster and their combination. Accordingly Claims 2, 4, 6, 14, 16 and 19 are also all allowable for depending from allowable
30 base claims.

 Within the Office Action, Claims 20 and 28 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Tsang.

The independent Claim 20 now recites a cleaning device comprising a detachable cleaning head comprising a first section with a first support surface with a first squeegee wiping element protruding therefrom and being configured to automatically rotate or oscillate while coupled to a motorized handle, a second section with a second support surface with a second squeegee wiping element protruding therefrom and surrounding the first section and being configured to automatically rotate or oscillate while coupled to the motorized handle, wherein the second section is configured to automatically rotate or oscillate at a rate or direction that is different from that of the first section wherein the squeegee protruding from the first support surface and the squeegee protruding from the second support surface each has opposed walls that form elongated wiping edges and bristles protruding from at least one of the first support surface and the second support surface wherein the bristles protrude from positions between the first squeegee wiping element and the second squeegee wiping element.

The independent Claim 28 now recites a device comprising a cleaning head, the cleaning head comprising a first support surface with a first squeegee element with opposed walls that form a first elongated and continuous wiping edge configured to treat a working surface, the first support surface being configured to move and a second support surface with a second squeegee element with opposed walls that form a second elongated and continuous wiping edge configured to simultaneously treat the working surface and bristles protruding from positions between the first squeegee wiping element and the second squeegee wiping element and, wherein at least one of the first support surface and the second support surface is configured to automatically move independently and separately of the other of the first support surface and the second support surface, while the cleaning head is coupled to a motorized handle.

The squeegee/and bristle configurations recited in the independent Claims 20 and 28 are not rendered obvious by the teachings of Tsang, because, as stated above, Tsang does not even teach a combination of sponges or polishing pads and bristles.

Further applying a combination of Tsang and Armbruster to further reject Claims 20 and 28 is unfounded for the same reasons described above. Specifically, the Claims 20 and 28 should be examined in their entirety not piecemeal, and the specific configurations of squeegee and bristles claimed in the independent Claims 20 and 28 are neither taught nor suggested by Tsang, Armbruster or their combination.

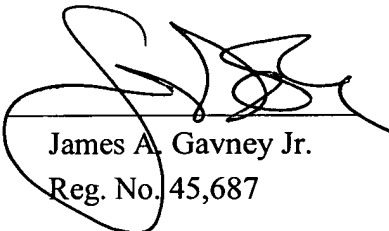
Within the Office Action Claims 21, 29 and 30 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Tsang in view of Armbruster. Claim 21 is dependent from the independent Claim 20 and Claim 29 and 30 are both dependent from the independent Claim 28.

As described above, the independent Claims 20 and 28 are both allowable over the teachings of Tsang. Accordingly, Claims 21, 29 and 30 are also all allowable as being dependent on allowable base claims.

For the reasons given above, Applicants respectfully submit that Claims 1, 2, 4, 6, 12, 14, 16, 19-20 and 25-33 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: 3/29/06

By: 
James A. Gavney Jr.
Reg. No. 45,687

Agent for Applicant(s)

CERTIFICATE OF MAILING (37 CFR § 1.8(a))

I hereby certify that this paper (along with any referred to as being attached or enclosed) is being deposited with the U.S. Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to the: Commissioner for Patents, P.O. Box 1450 Alexandria, VA 22313-1450

HAVERSTOCK & OWENS LLP.
Date: 3/29/06 By: FEU